

1 KEVIN V. RYAN (CSBN 118321)
2 United States Attorney

ORIGINAL
FILED

AUG 12 2004

RICHARD W. WIEKING
NORTHERN DISTRICT OF CALIFORNIA

3
4
5
6
7
8 UNITED STATES DISTRICT COURT FOR THE
9 NORTHERN DISTRICT OF CALIFORNIA

CRB

10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RANDOLPH S. BRONTE,

15 Defendant.

CR No. 04-0259

VIOLATIONS: 26 USC § 7201 - Tax
Evasion

SAN FRANCISCO VENUE

16
17 INDICTMENT

18 The Grand Jury charges:

19 COUNT ONE: (26 U.S.C. § 7201)

20 On or about August 10, 1999, in the Northern District of California, the defendant

21 RANDOLPH S. BRONTE

22 then a resident of Tiburon, California and doing business as Stephen Bronte Partners, did willfully and
23 knowingly attempt to evade and defeat the income tax due and owing by defendant to the United States
24 of America for the calendar year 1998 by preparing, signing, and mailing or otherwise delivering, and
25 causing to be prepared, signed and mailed or otherwise delivered, a false and fraudulent individual
26 income tax return, which return was filed with the Internal Revenue Service, wherein it was stated that
27 the tax due to the United States for the calendar year 1998 was "zero" whereas, as he then and there
28 well knew and believed, the tax due and owing to the United States for the calendar year was in truth

INDICTMENT

1 and in fact \$198,813.00

2 In violation of Title 26, United States Code, Section 7201.

3 COUNT TWO: (26 U.S.C. § 7201)

4 On or about October 15, 2000, in the Northern District of California, the defendant

5 RANDOLPH S. BRONTE

6 then a resident of Tiburon, California and doing business as Stephen Bronte Partners, did willfully and
7 knowingly attempt to evade and defeat the income tax due and owing by defendant to the United States
8 of America for the calendar year 1999 by preparing, signing, and mailing or otherwise delivering, and
9 causing to be prepared, signed and mailed or otherwise delivered, a false and fraudulent individual
10 income tax return, which return was filed with the Internal Revenue Service, wherein it was stated that
11 the tax due to the United States for the calendar year 1999 was "zero" whereas, as he then and there
12 well knew and believed, the tax due and owing to the United States for the calendar year was in truth
13 and in fact \$,1,591,152.00.

14 In violation of Title 26, United States Code, Section 7201.

15 COUNT THREE: (26 U.S.C. § 7201)

16 On or about October 15, 2001, in the Northern District of California, the defendant

17 RANDOLPH S. BRONTE

18 then a resident of Tiburon, California and doing business as Stephen Bronte Partners, did willfully and
19 knowingly attempt to evade and defeat the income tax due and owing by defendant to the United States
20 of America for the calendar year 2000 by preparing, signing, and mailing or otherwise delivering, and
21 causing to be prepared, signed and mailed or otherwise delivered, a false and fraudulent individual
22 income tax return, which return was filed with the Internal Revenue Service, wherein it was stated that
23 the tax due to the United States for the calendar year 2000 was "zero" whereas, as he then and there
24 well knew and believed, the tax due and owing to the United States for the calendar year was in truth
25 and in fact \$222,943.00.

26 In violation of Title 26, United States Code, Section 7201..

27 ///

28 ///

INDICTMENT

SENTENCING ENHANCEMENT ALLEGATIONS

With respect to all counts of the Indictment

(A) The tax loss exceeds \$2,000,000.00 and is composed of the following amounts of tax loss:

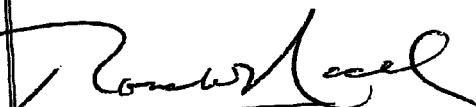
<u>Count</u>	<u>Tax Loss</u>
1	\$198,813.00
2	\$1,591,152.00
3	\$222,943.00

(B) Sophisticated means were used to impede discovery of the existence or extent of the offenses charged in the Indictment

A True Bill

FOREPERSON

KEVIN V. RYAN
United States Attorney


ROSS W. NADEL
Chief, Criminal Section

Approved as to Form


AUSA
JAY R. WEILL

INDICTMENT